

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
WORLDS, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	Civil Action No. 1:12-CV-10576 (DJC)
ACTIVISION BLIZZARD, INC.,	)	
BLIZZARD ENTERTAINMENT, INC. and	)	JURY TRIAL DEMANDED
ACTIVISION PUBLISHING, INC.,	)	
	)	
Defendants.	)	
_____	)	

**WORLDS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 7.2 and Section 12 of the Stipulated Protective Order entered by the Court in this action on December 26, 2012 (Dkt. No. 49) (the “Protective Order”), Plaintiff Worlds, Inc. (“Worlds”) hereby moves for leave to file under seal Exhibits B-12 through J-12 of Worlds’ Fourth Supplemental Disclosure of the Claims Infringed, filed March 4, 2014.<sup>1</sup>

In support of its motion, Worlds states that the foregoing includes information that Worlds has identified and designated as “HIGHLY RESTRICTED—CONFIDENTIAL SOURCE CODE” pursuant to the terms of the Protective Order. The sealed exhibits include non-public, proprietary, confidential, and commercially-sensitive information and computer source code relating to this litigation, and public access to this information will harm Worlds’ competitive positions. Worlds will provide unsealed versions of its sealed materials to the Court and to Defendants’ counsel, subject to the terms of the Protective Order.

<sup>1</sup> This filing is made pursuant to an agreement by the parties. Call of Duty: Ghosts was released in November 2013. On December 12, 2013, Activision agreed to permit Worlds to inspect source code for Call of Duty: Ghosts and then supplement its infringement contentions. On February 18, 2014, Worlds inspected source code for Call of Duty: Ghosts, and Worlds is submitting its hereby serving and filing its supplemental contentions on March 4, 2014.

WHEREFORE, Worlds respectfully requests that the Court grant its motion for leave to file under seal Exhibits B-12 through J-12 of Worlds' Fourth Supplemental Disclosure of the Claims Infringed. Should the Court deny this Motion to Seal, Worlds respectfully requests that the Court return the filings rather than placing it in the public file.

Dated: March 4, 2014

WORLDS, INC.

By its attorneys,

/s/ Ryan V. Caughey

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### **CERTIFICATE OF SERVICE**

I certify that a true copy of the above document was filed through the Court's ECF system on the above date and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Ryan V. Caughey

Ryan V. Caughey